

# **EXHIBIT 54**

# GIBSON, DUNN & CRUTCHER LLP

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January 3, 2007

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Client No.

TS4563-00001

**VIA E-MAIL, FAX AND  
REGULAR U.S. MAIL**

Travis T. Tygart  
Senior Managing Director and General Counsel  
U.S. Anti-Doping Agency  
1330 Quail Lake Loop, Suite 260  
Colorado Springs, Colorado 80906-4651

Re: *USADA v. Floyd Landis, AAA Case No. 30 190 00847 06*  
*Illegal Testing of B Samples*

Dear Mr. Tygart:

This is in response to your correspondence dated January 3, 2007. I am lead counsel in this matter. You may direct all correspondence to me, with a copy of that correspondence to Mr. Jacobs.

In your January 3 letter, you did not indicate a response to our demand that the retesting be halted. As a result, we are now, pursuant to Central District Local Rule 7-19.1, providing you with notice that (1) we intend to file a Complaint in the Central District of California on tomorrow, Thursday, January 4, 2007, naming the United States Anti-Doping Agency as a defendant and (2) we intend on filing an application for Temporary Restraining Order to prevent the illegal retesting on Friday, January 5, 2007. Please let me know if you oppose the application or if you intend to be present when the foregoing application is presented to the Court.

Please be aware that we consider the illegal retesting to constitute spoliation of evidence. Because the testing of the B Samples will use up the remainder of the samples, and because the testing procedures and protocol of the French laboratory are at issue in this case, we put you on notice that your proposed illegal retesting will destroy valuable evidence in this case.

LOS ANGELES NEW YORK WASHINGTON, D.C. SAN FRANCISCO PALO ALTO  
LONDON PARIS MUNICH BRUSSELS ORANGE COUNTY CENTURY CITY DALLAS DENVER

P.3

JAN 03 '07 04:33PM GIBSON DUNN & CRUTCHER #5168

USADA 1330

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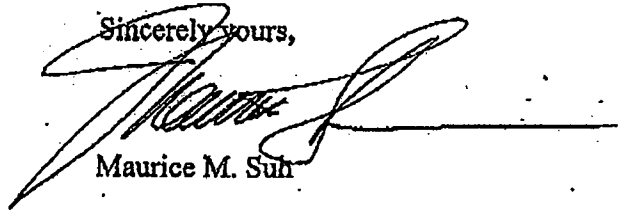
Travis T. Tygart

January 3, 2007

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As for the balance of the misrepresentations contained in your letter, suffice it to say that Mr. Jacobs and I both disagree with your characterizations of our previous conversations. Notwithstanding that, please let me reiterate that we wish to resolve the outstanding matter in this litigation in as cordial and mutually agreeable manner as possible. In that vein, for ease of communication, I suggest that we could agree that email correspondence is equivalent to signed and delivered correspondence...

Sincerely yours,



Maurice M. Suh

MMS/td

cc: Howard L. Jacobs

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